

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA

v.

ALISA SIROIS

No. 1:21-cr-175-LEW

PROSECUTION VERSION

If this matter were to proceed to trial, the government would prove the following facts beyond a reasonable doubt:

From at least 2016 through at least about July 21, 2020, within the District of Maine, defendant ALISA SIROIS conspired with others, including her husband, CC-1, to unlawfully distribute marijuana, as CC-1 grew his marijuana businesses in and around Farmington, Maine. During this time period, defendant was aware that CC-1's businesses were not compliant with Maine's medical marijuana laws, though CC-1 held those businesses out as such. ALISA SIROIS was aware—in part because she conducted numerous financial tasks relating to the conspiracy at CC-1's direction—that CC-1 operated his business as a collective enterprise, illegal under Maine law. For example, CC-1 paid employees a set salary each week to cultivate marijuana at facilities CC-1 owned and controlled, including the "Shoe Shop" at 374 High Street in Farmington. CC-1 then sold the marijuana cultivated by his employees, which all belonged to CC-1 from seed to harvest to curing and packaging, as all involved understood. CC-1 sought to document these employment relationships as lease agreements, and sought to characterize income from marijuana sales as rental payments, all in order to maintain the appearance of compliance for Office of Marijuana Policy inspectors and the public.

Defendant received compensation for her participation in CC-1's marijuana businesses. Defendant's responsibilities included, at various times, distributing cash payroll to employee "caregivers," cultivating marijuana in grow facilities owned by CC-1, communicating financial information (all supplied by CC-1) to CC-1's bookkeeper and accountant, and delivering cash deposits to CC-1's various bank accounts. At times, and in order to hide the source of these funds from the banks CC-1 utilized, defendant would seek to store cash along with air fresheners during her deliveries, in an attempt to mask the smell of marijuana emanating from the currency.

Dated: May 5, 2025

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CERTIFICATE OF SERVICE

I hereby certify that on May 5, 2025, I electronically filed the Prosecution Version with the Clerk of Court using the CM/ECF system which will send notifications of such filing to all counsel of record.

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